

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

UNITED STATES OF AMERICA

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CRIMINAL NO.

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18 U.S.C. § 513(a)

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18 U.S.C. § 514(a)

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18 U.S.C. § 1344

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18 U.S.C. § 1028A

VERSUS

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18 U.S.C. § 922(g)(9)

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CAMERON MICHAEL MARKS

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6:23-cr-00143-01

Judge Hicks

Magistrate Judge Whitehurst

INDICTMENT

THE FEDERAL GRAND JURY CHARGES:

COUNT 1

SECURITIES FRAUD

18 U.S.C. § 513

On or about July 12, 2022, in the Western District of Louisiana, the defendant, CAMERON MICHAEL MARKS, did knowingly make and possess a counterfeited and forged security, to wit: a money order, of Western Union, an organization as defined by Title 18 United States Code, Section 513(c)(4), which operates in and the activities of which affect interstate or foreign commerce, with the intent to deceive another person, in violation of Title 18, United States Code, Section 513(a). [18 U.S.C. § 513(a)].

COUNT 2

**PASSING FICTITIOUS OBLIGATIONS
18 U.S.C. § 514(a)(2)**

On or about June 23, 2022, in the Western District of Louisiana, the defendant, CAMERON MICHAEL MARKS, with the intent to defraud, knowingly passed or uttered a false or fictitious instrument, appearing, representing, purporting, and contriving through scheme or artifice to be an actual security and financial instrument issued under the authority of an organization as defined by Title 18, United States Code, Section 513(c), to wit, a check, numbered 60 drawn on JPMorgan Chase Bank, N.A. for \$838.52 made payable to Cameron Marks; all in violation of Title 18, United States Code, Section 514(a)(2). [18 U.S.C. § 514(a)(2)].

COUNT 3

**BANK FRAUD
18 U.S.C. § 1344(2)**

On or about May 26, 2022, in the Western District of Louisiana, the defendant, CAMERON MICHAEL MARKS, did knowingly execute a scheme and artifice to obtain moneys, funds, credits, assets, securities, and other property owned by or under the custody or control of Capital One Bank, N.A. and Community First Bank, both federally insured financial institutions, and attempted to do so, by means of false and fraudulent pretenses, representations, and promises in that the defendant opened a checking account bearing account number XXXXXXXX5006 in the name of D.A. at Capital One Bank and deposited a fraudulent check drawn on an account at Community First Bank into the Capital One account without the knowledge or

consent of D.A. in violation of Title 18, United States Code, Section 1344(2). [18 U.S.C. § 1344(2)].

COUNT 4

**AGGRAVATED IDENTITY THEFT
18 U.S.C. § 1028A(a)(1)**

On or about May 26, 2022, in the Western District of Louisiana, the defendant, CAMERON MICHAEL MARKS, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit; the name and date of birth of D.A., knowing that the means of identification belonged to another actual person. The defendant did so in relation to the commission of a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: 18 U.S.C. § 1344; all in violation of Title 18, United States Code, Section 1028A(a)(1). [18 U.S.C. § 1028A(a)(1)].

COUNT 5

**BANK FRAUD
18 U.S.C. § 1344(2)**

On or about June 11, 2022, in the Western District of Louisiana, the defendant, CAMERON MICHAEL MARKS, did knowingly execute a scheme and artifice to obtain moneys, funds, credits, assets, securities, and other property owned by or under the custody or control of Capital One Bank, N.A. and JPMorgan Chase Bank, N.A., both federally insured financial institutions, and attempted to do so, by means of false and fraudulent pretenses, representations, and promises in that the defendant opened a checking account bearing account number XXXXXXXX4912 in the name of D.A. at Capital One Bank and deposited a fraudulent check drawn on an

account at JPMorgan Chase Bank into the Capital One account without the knowledge or consent of D.A. in violation of Title 18, United States Code, Section 1344(2). [18 U.S.C. § 1344(2)].

COUNT 6

**AGGRAVATED IDENTITY THEFT
18 U.S.C. § 1028A(a)(1)**

On or about June 11, 2022, in the Western District of Louisiana, the defendant, CAMERON MICHAEL MARKS, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit; the name and date of birth of D.A., knowing that the means of identification belonged to another actual person. The defendant did so in relation to the commission of a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: 18 U.S.C. § 1344; all in violation of Title 18, United States Code, Section 1028A(a)(1). [18 U.S.C. § 1028A(a)(1)].

COUNT 7

**BANK FRAUD
18 U.S.C. § 1344(2)**

On or about June 20, 2022, in the Western District of Louisiana, the defendant, CAMERON MICHAEL MARKS, did knowingly execute a scheme and artifice to obtain moneys, funds, credits, assets, securities, and other property owned by or under the custody or control of The Bank of Missouri, a federally insured financial institution, and attempted to do so, by means of false and fraudulent pretenses, representations, and promises in that the defendant opened an account in the name

of B.M. through Continental Finance without the knowledge or consent of B.M. in violation of Title 18, United States Code, Section 1344(2). [18 U.S.C. § 1344(2)].

COUNT 8

**AGGRAVATED IDENTITY THEFT
18 U.S.C. § 1028A(a)(1)**

On or about June 20, 2022, in the Western District of Louisiana, the defendant, CAMERON MICHAEL MARKS, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit; the name, social security number, and date of birth of B.M., knowing that the means of identification belonged to another actual person. The defendant did so in relation to the commission of a felony enumerated in Title 18, United States Code, Section 1028A(c), to wit: 18 U.S.C. § 1344; all in violation of Title 18, United States Code, Section 1028A(a)(1). [18 U.S.C. § 1028A(a)(1)].

COUNT 9

**POSSESSION OF A FIREARM BY A PROHIBITED PERSON
18 U.S.C. § 922(g)(9)**

On or about July 12, 2022, in the Western District of Louisiana, the defendant, CAMERON MICHAEL MARKS, knowingly possessed a firearm that had been shipped or transported in interstate commerce, that is, one Keltech .22 caliber pistol, serial number ME253. The defendant had been convicted of a misdemeanor crime of domestic violence, to wit: domestic abuse battery, a violation of Louisiana Revised Statutes 14:35.3, on April 3, 2018, docket number 2018-CR-104. At the time he

possessed the firearm, the defendant knew that he had been convicted of this misdemeanor; all in violation of Title 18, United States Code, Section 922(g)(9). [18 U.S.C. § 922(g)(9)].

Forfeiture Allegation
[18 U.S.C. § 924(d)(1)]

(A) The allegations contained in Count 9 are incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c). [18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)].

(B) As a result of the violations in Count 9 of this Indictment, the defendant, CAMERON MICHAEL MARKS, shall forfeit to the United States his interest in any firearm involved in or possessed during those offenses, including:

- (1) One (1) Keltech, .22 caliber pistol, serial number ME253, as described in Count 1 of this Indictment;

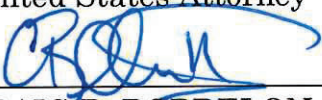
in violation of Title 18, United States Code, Section 924(d)(1) [18 U.S.C. § 924(d)(1)].

A TRUE BILL:

REDACTED

GRAND JURY FOREPERSON

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